

Brian Quiros

From: Tisa, Kimberly
Sent: Thursday, September 15, 2016 4:34 PM
To: Mike Zarba
Cc: Doubleday, Edward; Trombly, Gary; Tisa, Kimberly
Subject: RE: Approval of Phase III Work

Gentlemen:

I have reviewed the CWP dated August 15, 2016 as requested and provide the following:

1. Section 1.0 Introduction. 8 tasks are identified in this section; however, these items do not appear to cover all proposed activities as described in the Notification and/or do appear to be consistent with EPA's Approval. These activities are shown below with the CWP tasks so indicated in the CWP in italics.
 - T4-6 concrete slab (to a minimum depth of 2 inches) will be removed and disposed of as a greater than or equal to (" \geq ") 50 ppm PCB waste. *CWP states full 8 inch depth removal and disposed as \geq 50 ppm. However on page 7/17 of the CWP, it indicates a 2" depth removal.*
 - T1 soils located in SB-7A area and SB-9A area will be removed and disposed of as a \geq 50 ppm and less than (" $<$ ") 50 ppm PCB waste, respectively. *CWP is consistent*
 - T3 soil shall be removed and disposed of as a $<$ 50 ppm PCB waste. *CWP is consistent*
 - Building slab located at B38 and B39 sample locations will be removed and disposed as a $<$ 50 ppm PCB waste. *CWP is consistent*
 - Building-wide milled concrete will be removed and disposed of as a $<$ 50 ppm PCB waste. *CWP is consistent*
 - Drain lines, associated piping and residuals will be removed and disposed as a \geq 50 ppm PCB waste or, alternatively additional sampling will be conducted to confirm PCB concentrations for off-site disposal. *not in CWP*
 - Acid lines and overlying concrete will be removed and disposed of as a $<$ 50 ppm PCB waste. *not in CWP*
 - Exterior soil at sample location E4-B14 and outside the electrical room will be removed and disposed as a $<$ 50 ppm PCB waste. *CWP is consistent*
 - Concrete foundation exterior to the electrical room will be removed and disposed as a $<$ 50 ppm PCB waste. *not in CWP*
 - Concrete slab located in the lumber storage/box shop area will be removed and disposed as a $<$ 50 ppm PCB waste. *CWP is consistent*

- *CWP also include expansion joint caulk and adjacent 3-inches of concrete on either side, which is proposed in Addendum to SIP.*
 - *CWP proposes to dispose of concrete overlying T-1 and T-3 as < 50 ppm PCB waste. However, EPA approval required overlying concrete in SB-7A area to be disposed as > 50 ppm PCB waste, but provided for alternative disposal based on sampling.*
2. For removal of the concrete adjacent to the expansion joint caulk, it is indicated that the concrete will be handled as a PCB bulk product waste that also contain PCB remediation waste. Given that the PCB concentrations in the concrete appear to be < 50 ppm and the fact that the proposal disposal facility is Turnkey in NH, EPA understands that Turnkey could accept both PCB bulk product and PCB remediation waste. However, in the event the disposal facility changes, this may not be true.
 3. Page 6 of 17. Section 3.1. EPA does not understand the statement "remove the majority of the greater than 50 ppm PCB caulk and adjacent concrete". Why would all greater than 50 ppm PCB caulk be removed prior to milling the floor slab?
 4. Page 6 of 17. Removal of top 1 inch of concrete. Please see EPA comments on Addendum to SIP pertaining to concrete PCB sample results for > 1 inch depth.
 5. Section 3.1. Work Sequence
 - a. Based on the work sequence/details, it appears that following removal of the cranes, the building will be demolished and then the concrete, caulk, etc. will be removed. Is this correct?
 - b. Item 6. Recycling is contingent upon data to support it, at least for the structural steel beams.
 6. Page 10. Section 6.0 Disposal. PCB bulk product waste must be disposed in accordance with 761.62, not 761.61.
 7. Where will PCB-generated waste be stored at the Site? There are also marking requirements for containers and for storage areas. Please see 40 CFR 761.40 and 761.45.
 8. Where will PCB-contaminated soil with < 50 ppm, solid decontamination waste, and liquid decontamination wastes be disposed of?
 9. Given that it appears the building will be demolished prior to removal of all PCBs, please clarify what the air monitoring provisions are, who will be doing the monitoring, and what the air action levels are.
 10. Please confirm that the state regulated material (PCBs < 50 ppm) referred to on page 10 are the < 50 ppm PCB-containing caulk. Otherwise, please clarify what this waste is.
 11. As previously indicated, please provide a copy of the CWP to CTDEEP for its review since CT-regulated wastes will be removed during this work, as well.

Should you have any questions, please feel free to contact me.

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From: Daniel Stanton [mailto:dstanton@newmilford.org]
Sent: Friday, August 19, 2016 7:35 AM
To: Tisa, Kimberly <Tisa.Kimberly@epa.gov>
Cc: Mike Zarba <MZarba@newmilford.org>; Laurene Beattie <LBeattie@newmilford.org>; Doubleday, Edward <EDoubleday@trcsolutions.com>
Subject: Approval of Phase III Work

Dear Kim:

In accordance with item 11.b of the Approval letter dated September 1, 2015, your approval of the attached Costello Work Plan is requested. This plan addresses all activities under the Approval Letter.

Should you have any questions or require additional information please feel free to contact me, or Ed Doubleday of TRC at [860 298-6245](tel:8602986245).

Thank You,

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Daniel Stanton, PE, MASCE, CPII
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